



October 28, 2019

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Bureau of Land Management, Alaska
VIA EMAIL: BLM_AK_Willow_Comments@blm.gov

RE: Bureau of Land Management's (BLM) DEIS for the Willow Master Development Plan (MDP)

Lynden is a multi-modal transportation and logistics company, providing transportation and construction services for all segments of the economy throughout Alaska. We recognize the benefits of natural resource exploration, development and production to support increased commerce in Alaska.

This letter is in support of MDP, Alternative B, as its Preferred Alternative and module transfer Option 1 as an option in the Final EIS.

Lynden has been operating on the North Slope since 1969, providing trucking, barging, air and hovercraft support over the years since the beginning of oil and gas exploration and production. We firmly believe that continued development can occur in a safe and environmentally responsible manner and this is exactly the type of development that Alaskans support for the economic opportunities it brings to the State and the US.

The Willow MDP project had some specific points that have been addressed in the Draft SEIS that we would like to comment on:

Most important, this project will generate significant new revenue not only for the federal government, the State of Alaska, Native corporations, the North Slope Borough, and North Slope communities, but also the support industries such as ours who have a direct jobs and economic stake in the growth of private industry in Alaska. As a result of this project, there will be significant employment during construction which will generate logistics and transportation requirements; a direct translation to jobs and steady Alaska growth.

Lynden has long been a proponent of increasing the throughput in the TAPS line. This pipeline is a lifeline to Alaska's economic health, and adding in the Willow production of oil helps improve the economics, and again leads to continued private sector jobs.

As a company who has operated with scheduled service to Alaska for over 60 years, we have seen the development of Alaska's resources. This has come about with changes and strengthening of the mitigation measures that have been put in place to ensure a balance of resource development and conservation. We are proud of the work the State and the industry have achieved. Supporting a thriving subsistence lifestyle and protecting the environment are

possible and have been done with excellence. The extensive list of mitigation measures and best practices for NPR-A is a testimony to the strong commitment that all parties have to build infrastructure, develop Alaska's natural resources, and minimize impact. However, the balance also requires recognition of the benefits of mitigated impact. We can and should be able to support a strong economy as well.

Transportation services and the potential economic development with expanded transportation is often overlooked; however, we submit that the review of the logistics options creates challenges; however, we are confident that Alaska has the expertise to overcome these challenges and help increase oil in the pipeline.

We believe ConocoPhillips has consistently proven that it can operate responsibly, and in an environmentally sustainable manner, with a commitment to protecting the environment and wildlife.

Additional comments we support include:

- Development of the proposed \$5 billion project would provide benefits to the local and state economies through local hire for jobs created during construction and operations, tax revenues, federal revenue sharing from royalties and lease rentals/bonuses, and new resources to help meet domestic energy demand.
- The proposed MDP conforms to the BLM's 2013 Integrated Activity Plan (IAP) which provides a framework for minimizing impacts. The project proponent has collected extensive biological and engineering data since 2017 to inform the Willow EIS process.
- Oil and gas development in NPR-A could ultimately prove indispensable, given forecasts that predict our nation's energy demands increasing over ten percent in the next 25 years. Even with dramatic increases in alternative energy sources, the majority of these growing energy demands will continue to be satisfied through the use of fossil fuels.
- Production from Willow would serve to help maintain the integrity of the Trans-Alaska Pipeline System (TAPS), a critical link to America's energy distribution. Given the vast resources believed to be available in NPR-A, future production could reverse the decline in TAPS, allowing it to remain viable for decades.
- Conversely, prohibiting development and production at Willow would set a dangerous precedent for future development in NPR-A, severely compromising the long-term energy and economic security of Alaska and the nation.
- Production from Willow would help meet the purpose of NPR-A, which is to develop America's energy resources. The 23-million acre reserve was set aside nearly a century ago for its petroleum value. In an updated report, the U.S. Geological Survey estimates the reserve could hold nearly 9 billion barrels of oil.
- The industry has made great strides in responsibly designing projects in the Arctic with minimal impact on the environment, wildlife, and subsistence activities.
- The Proposed Master Development Plan and Preferred Alternative minimizes impacts and maintains high standards for safety and emergency response and leverages contemporary North Slope best management practices to avoid and minimize impacts.

- Alternative B would reduce environmental impacts compared to other alternatives by using less gravel fill, fresh water, and aircraft flights, while improving year-round access for local residents.
- Road connections are required for safe and environmentally sound operations. Alternative B allows for a road connection to the Alpine field infrastructure and road connections to all drill sites.
- The industry employs rigorous standards to protect the environment and subsistence resources. Industry has an excellent record and a long history of operating responsibly and working with stakeholders on the North Slope and in the Arctic.

BLM should move forward expeditiously with the proposed Master Development Plan in accordance with the recently issued Executive Orders and Secretarial guidance on streamlining and improving the NEPA and other regulatory processes.

We support the BLM's responsibility to regulate the oil and gas industry in a manner that is fair and proportionate. We respectfully request that the BLM adopt Alternative B as presented in the DEIS.

Sincerely,



Jeanine St. John
Vice President